

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
CHICAGO DIVISION**

DOMINIC GWINN,)	
)	
Plaintiff,)	Case No. 23-cv-1823
)	
v.)	Hon. Jeremy C. Daniel
)	
CITY OF CHICAGO, <i>et al.</i> ,)	
)	
Defendants.)	

**EXHIBIT C TO FINAL PRETRIAL ORDER:
DEFENDANTS' LIST OF TRIAL EXHIBITS**

Defendants, the City of Chicago and David O'Neal Brown, by and through their undersigned counsel, hereby submit the following exhibits for trial. Defendants reserve all rights to modify this list based on any inadvertent omission, trial materials disclosed by Plaintiff, testimony of any witness at trial, or any good-faith need. Defendants also reserve all rights to use any materials, whether or not disclosed herein, for the purpose of impeachment or rebuttal, including, but not limited to, prior witness testimony (written or oral). Defendants reserve all rights not to introduce or seek admission into evidence of any materials on this list.

TRIAL EX. NO.	DESCRIPTION	BATES/DKT. NOS.	PLAINTIFF'S OBJECTION(S)
D1	Screenshots of Gwinn's prior tweets showing use of watermarks	CITY 0065-69	Plaintiff objects to this proposed exhibit as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.

D2	True and accurate copy of Plaintiff's video footage deposit with the U.S. Copyright Office (the "Work")	Dkt. 58	Plaintiff objects to this proposed exhibit as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
D3	Defendants' February 8, 2024 request to U.S. Copyright Office	Dkt. 63-3	Plaintiff objects to this proposed exhibit as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
D4	Copyright Office's July 29, 2024 response to Defendants' February 8, 2024 request	Dkt. 63-4	Plaintiff objects to this proposed exhibit as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
D5	Screenshots of the Work as deposited with U.S. Copyright Office	Dkt. 63-5	Plaintiff objects to this proposed exhibit as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
D6	Demonstrative exhibit showing chronology of events.		Plaintiff objects on numerous grounds. This information was never disclosed

			<p>nor produced by Gwinn in discovery nor in preparation for this Pretrial Order. Plaintiff has never seen this evidence, and is unaware of what this exhibit is. This exhibit has not been authenticated, lacks foundation, and is irrelevant. See Fed. R. Evid. 401, 901.</p>
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DATED: August 18, 2025

Respectfully submitted,

CITY OF CHICAGO and DAVID O'NEAL BROWN

By: /s/ Joseph F. Schmidt
One of Their Attorneys

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